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4 KROLOFF, BELCHER, SMART,  
5 PERRY & CHRISTOPHERSON  
6 7540 Shoreline Drive (95219)  
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8 Stockton, CA 95269-2050  
9 PHONE: (209) 478-2000

10 Attorneys for Defendant  
11 BARTON HEALTHCARE SYSTEM

12 UNITED STATES DISTRICT COURT  
13 EASTERN DISTRICT OF CALIFORNIA

14 THERESA HOLBROOK KRAFT, on behalf  
15 of herself and as Successor-in-Interest of  
16 PAUL M. KRAFT, RACHEL KRAFT,  
17 SARAH KRAFT, and JEFFREY KRAFT,  
18 minors by their Guardian ad Litem, SUSAN  
19 KAREN HOLBROOK,

20 Plaintiffs,

21 v.

22 SHANNON LANEY, DEANNA LEWIS,  
23 SCHYLER BEATY, MARK GENTLE,  
24 LESLIE SCOTT, CITY OF SOUTH LAKE  
25 TAHOE, CALIFORNIA, DONALD  
26 ATKINSON, COUNTY OF EL DORADO,  
27 CALIFORNIA, BARTON HEALTHCARE  
28 SYSTEM, INC., BARTON MEMORIAL  
HOSPITAL MANAGEMENT SERVICES  
ORGANIZATION, INC. and DOES 3  
through 15, inclusive,

Defendants

NO. S-04-129 EJG GGH

STIPULATION RE FILING OPPOSITION  
TO PLAINTIFF'S MOTION TO  
EXCLUDE TESTIMONY OF  
DEFENDANT BARTON HEALTHCARE  
SYSTEM'S EXPERT TIMOTHY  
ALBERTSON, M.D.

**STIPULATION**

The parties to this action, through their respective attorneys of record, stipulate that the  
Opposition of Barton Healthcare System to Plaintiff's Motion to Exclude Testimony of Defendant

Stipulation re Filing Opposition  
to Plaintiff's Motion to Exclude  
Testimony of Defendant Barton Healthcare  
Systems Expert Timothy Albertson, M.D.

1 Barton Healthcare System's expert Timothy Albertson, M.D. may be filed on or before Wednesday,  
2 September 14, 2005.

3 DATED: September 9, 2005

LAW OFFICES OF AMITAI SCHWARTZ

4  
5 By: /s/  
6 AMITAI SCHWARTZ  
7 Attorneys for Plaintiffs

8 DATED: September 9, 2005

MCDONALD, SABELTZER, MORRIS,  
CREEGGAN & WADDOCK

9  
10 By: /s/  
11 RICHARD C. CREEGGAN,  
12 Attorneys for Defendants,  
13 SHANNON LANEY, DEANNA LEWIS, SCHYLER  
14 BEATY, MARK GENTLE, LESLIE SCOTT, DON  
15 MUREN and CITY OF SOUTH LAKE TAHOE

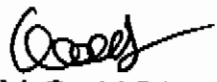
16 DATED: September 9, 2005

KROLOFF, BELCHER, SMART,  
PERRY & CHRISTOPHERSON

17 By: /s/  
18 THOMAS O. PERRY  
19 Attorneys for Defendant  
20 BARTON HEALTHCARE SYSTEM

21 IT IS SO ORDERED.

22 Dated: Sept. 13, 2005

23  
24   
25 GREGORY G. HOLLOWES

26 Hon. Gregory G. Hollows  
27 United States Magistrate Judge

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